

# EXHIBIT “C”

## ALABAMA SJIS CASE DETAIL



County: **01** Case Number: **CV-2017-900207.00** Court Action:  
 Style: **ANGELA PAGE ET AL V. SAHDEV DHALI WAL TRANSPORT, INC ET AL**

PREPARED FOR: PAUL MILLER

Real Time

## Case

## Case Information

County: **01-JEFFERSON -** Case Number: **CV-2017-900207.00** Judge: **JFH:JIM HUGHEY III**  
 Style: **ANGELA PAGE ET AL V. SAHDEV DHALI WAL TRANSPORT, INC ET AL**  
 Filed: **01/19/2017** Case Status: **ACTIVE** Case Type: **NEGLIGENCE MOTOR VEH**  
 Trial Type: **JURY** Track: Appellate Case: **0**  
 No of Plaintiffs: **2** No of Defendants: **2**

## Damages

Damage Amt: **0.00** Punitive Damages: **0.00** General Damages: **0.00**  
 No Damages: Compensatory Damages: **0.00**  
 Pay To: Payment Frequency: Cost Paid By:

## Court Action

Court Action Code: Court Action Desc: Court Action Date:  
 Num of Trial days: **0** Num of Liens: **0** Judgment For:  
 Disposition Date of Appeal: Disposition Judge: : Disposition Type:  
 Revised Judgement Date: Minstral: Appeal Date:  
 Date Trial Began but No Verdict (TBNV1):  
 Date Trial Began but No Verdict (TBNV2):

## Comments

Comment 1:  
 Comment 2:

## Appeal Information

Appeal Date: Appeal Case Number: Appeal Court:  
 Appeal Status: Origin Of Appeal:  
 Appeal To: Appeal To Desc: LowerCourt Appeal Date:  
 Disposition Date Of Appeal: Disposition Type Of Appeal:

## Administrative Information

Transfer to Admin Doc Date: Transfer Reason: Transfer Desc:  
 Number of Subponeas: Last Update: **03/03/2017** Updated By: **AJA**

## Parties

## Party 1 - Plaintiff INDIVIDUAL - PAGE ANGELA

## Party Information

Party: **C001-Plaintiff** Name: **PAGE ANGELA** Type: **INDIVIDUAL**  
 Index: **D SAHDEV DHALI** Alt Name: Hardship: **No** JID: **JFH**  
 Address 1: **C/O JEFF LEONARD** Phone: **(205) 000-0000**

Address 2: 2224 1ST AVENUE NORTH

City: BIRMINGHAM

State: AL

Zip: 35203-0000 Country: US

SSN: XXX-XX-X999

DOB:

Sex:

Race:

**Court Action**

Court Action:

Amount of Judgement: \$0.00

Court Action For:

Court Action Date:

Cost Against Party: \$0.00

Other Cost: \$0.00

Exemptions:

Comment:

Date Satisfied:

Warrant Action Date:

Warrant Action Status:

Arrest Date:

Status Description:

**Service Information**

Issued: Issued Type:

Reissue:

Reissue Type:

Return: Return Type:

Return:

Return Type:

Served: Service Type

Service On:

Served By:

Answer: Answer Type:

Notice of No Service:

Notice of No Answer:

**Attorneys**

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	LEO019		LEONARD JEFFREY PHILLIPS	JLEONARD@HGDILAWFIRM.COM	(205) 326-3336

**Party 2 - Plaintiff INDIVIDUAL - MCKINSTRY ANGELA PAGE AS MOTHER AND NEXT FRIEND OF****Party Information**

Party: C002-Plaintiff Name: MCKINSTRY ANGELA PAGE AS MOTHER AND NEXT Type: I-INDIVIDUAL  
 Index: D SAHDEV DHALI Alt Name: FRIEND OF Hardship: No JID: JFH  
 Address 1: C/O JEFFREY LEONARD Phone: (205) 000-0000  
 Address 2: 2224 FIRST AVENUE NORTH  
 City: BIRMINGHAM State: AL Zip: 35203-0000 Country: US  
 SSN: XXX-XX-X999 DOB: Sex: Race:

**Court Action**

Court Action:

Amount of Judgement: \$0.00

Court Action For:

Court Action Date:

Cost Against Party: \$0.00

Other Cost: \$0.00

Exemptions:

Comment:

Date Satisfied:

Warrant Action Date:

Warrant Action Status:

Arrest Date:

Status Description:

**Service Information**

Issued: Issued Type:

Reissue:

Reissue Type:

Return: Return Type:

Return:

Return Type:

Served: Service Type

Service On:

Served By:

Answer: Answer Type:

Notice of No Service:

Notice of No Answer:

**Attorneys**

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	LEO019		LEONARD JEFFREY PHILLIPS	JLEONARD@HGDLLAWFIRM.COM	(205) 326-3336

**Party 3 - Defendant BUSINESS - SAHDEV DHALI WAL TRANSPORT, INC****Party Information**

Party: D001-Defendant Name: SAHDEV DHALI WAL TRANSPORT, INC Type: B-BUSINESS  
 Index: C PAGE ANGELA Alt Name: Hardship: No JID: JFH  
 Address 1: C/O HARWINDER S. DHALI WAL Phone: (205) 000-0000  
 Address 2: 15006 DANUBE WAY  
 City: HAYMARKET State: VA Zip: 20169-0000 Country: US  
 SSN: XXX-XX-X999 DOB: Sex: Race:

**Court Action**

Court Action: Court Action Date:  
 Amount of Judgement: \$0.00 Court Action For: Exemptions:  
 Cost Against Party: \$0.00 Other Cost: \$0.00 Date Satisfied:  
 Comment: Arrest Date:  
 Warrant Action Date: Warrant Action Status: Status Description:

**Service Information**

Issued: 01/19/2017 Issued Type: A-PROCESS SERVER Reissue: Reissue Type:  
 Return: Return Type: Return: Return Type:  
 Served: 02/09/2017 Service Type: V-PROCESS SERVER Service On: Served By:  
 Answer: 03/03/2017 Answer Type: D-COMPLAINT DENIED Notice of No Service: Notice of No Answer:

**Attorneys**

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	MIL011		MILLER PAUL ALBERT	PMILLER@MCK-LAW.COM	(205) 326-0000
Attorney 2	FRA051		FRANKLIN PATRICK WAYNE	PFRANKLIN@MCK-LAW.COM	(205) 326-0000

**Party 4 - Defendant INDIVIDUAL - SAEED AHMED****Party Information**

Party: D002-Defendant Name: SAEED AHMED Type: I-INDIVIDUAL  
 Index: C PAGE ANGELA Alt Name: Hardship: No JID: JFH  
 Address 1: 3324 VALLEY BROOK PLACE Phone: (205) 000-0000  
 Address 2: APT. 3361  
 City: DECATUR State: GA Zip: 30033-0000 Country: US  
 SSN: XXX-XX-X999 DOB: Sex: M Race:

**Court Action**

Court Action:  
 Amount of Judgement: \$0.00  
 Cost Against Party: \$0.00  
 Comment:  
 Warrant Action Date:

Court Action For:  
 Other Cost: \$0.00  
 Warrant Action Status:

Court Action Date:  
 Exemptions:  
 Date Satisfied:  
 Arrest Date:  
 Status Description:

**Service Information**

Issued: 01/19/2017 Issued Type: A-PROCESS SERVER Reissue:  
 Return: Return Type: Reissue Type:  
 Served: 01/24/2017 Service Type V-PROCESS SERVER Return:  
 Answer: 02/24/2017 Answer Type: D-COMPLAINT DENIED Service On:  
 Notice of No Service: Notice of No Answer:

**Attorneys**

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	MIL011		MILLER PAUL ALBERT	PMILLER@MCK-LAW.COM	(205) 326-0000
Attorney 2	FRA051		FRANKLIN PATRICK WAYNE	PFRANKLIN@MCK-LAW.COM	(205) 326-0000

**Financial****Fee Sheet**

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	CONV	C001	000	\$0.00	\$22.49	\$0.00	\$0.00 0	
ACTIVE	N	CVAP	C001	000	\$100.00	\$100.00	\$0.00	\$0.00 0	
ACTIVE	N	CV05	C001	000	\$306.00	\$306.00	\$0.00	\$0.00 0	
ACTIVE	N	JDMD	C001	000	\$100.00	\$100.00	\$0.00	\$0.00 0	
ACTIVE	N	SERA	C001	000	\$10.00	\$10.00	\$0.00	\$0.00 0	
ACTIVE	N	VADM	C001	000	\$45.00	\$45.00	\$0.00	\$0.00 0	
<b>Total:</b>					<b>\$561.00</b>	<b>\$583.49</b>	<b>-\$22.49</b>	<b>\$0.00</b>	

**Financial History**

Transaction Date	Description	Disbursement Account	Transaction Batch	Receipt Number	Amount	From Party	To Party	Money Type	Admin Fee	Reason	Attorney	Operator
01/19/2017	CREDIT	CONV	2017074	8520200	\$22.49	C001	000	N				EDH
01/19/2017	RECEIPT	CVAP	2017074	8520210	\$100.00	C001	000	N				EDH
01/19/2017	RECEIPT	CV05	2017074	8520220	\$306.00	C001	000	N				EDH
01/19/2017	RECEIPT	JDMD	2017074	8520230	\$100.00	C001	000	N				EDH
01/19/2017	RECEIPT	SERA	2017074	8520240	\$10.00	C001	000	N				EDH
01/19/2017	RECEIPT	VADM	2017074	8520250	\$45.00	C001	000	N				EDH

**Case Action Summary**

Date:	Time	Code	Comments	Operator
1/19/2017	8:59 AM	ECOMP	COMPLAINT E-FILED.	LEO019
1/19/2017	9:00 AM	FILE	FILED THIS DATE: 01/19/2017 (AV01)	AJA
1/19/2017	9:00 AM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	AJA
1/19/2017	9:00 AM	ASSJ	ASSIGNED TO JUDGE: JIM HUGHEY III (AV01)	AJA
1/19/2017	9:00 AM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	AJA
1/19/2017	9:00 AM	TDMJ	JURY TRIAL REQUESTED (AV01)	AJA

1/19/2017	9:00 AM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	AJA
1/19/2017	9:00 AM	ORIG	ORIGIN: INITIAL FILING (AV01)	AJA
1/19/2017	9:00 AM	C001	C001 PARTY ADDED: PAGE ANGELA (AV02)	AJA
1/19/2017	9:00 AM	C001	INDIGENT FLAG SET TO: N (AV02)	AJA
1/19/2017	9:00 AM	C001	LISTED AS ATTORNEY FOR C001: LEONARD JEFFREY PHIL	AJA
1/19/2017	9:00 AM	C001	C001 E-ORDER FLAG SET TO "N" (AV02)	AJA
1/19/2017	9:00 AM	C002	C002 PARTY ADDED: MCKINSTRY ANGELA PAGE AS MOTHER	AJA
1/19/2017	9:00 AM	C002	INDIGENT FLAG SET TO: N (AV02)	AJA
1/19/2017	9:00 AM	C002	LISTED AS ATTORNEY FOR C002: LEONARD JEFFREY PHIL	AJA
1/19/2017	9:00 AM	C002	C002 E-ORDER FLAG SET TO "N" (AV02)	AJA
1/19/2017	9:00 AM	D001	D001 PARTY ADDED: SAHDEV DHALIWAL TRANSPORT, INC	AJA
1/19/2017	9:00 AM	D001	INDIGENT FLAG SET TO: N (AV02)	AJA
1/19/2017	9:00 AM	D001	PROCESS SERVE ISSUED: 01/19/2017 TO D001 (AV02)	AJA
1/19/2017	9:00 AM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	AJA
1/19/2017	9:00 AM	D001	D001 E-ORDER FLAG SET TO "N" (AV02)	AJA
1/19/2017	9:00 AM	D002	D002 PARTY ADDED: SAEED AHMED (AV02)	AJA
1/19/2017	9:00 AM	D002	LISTED AS ATTORNEY FOR D002: PRO SE (AV02)	AJA
1/19/2017	9:00 AM	D002	D002 E-ORDER FLAG SET TO "N" (AV02)	AJA
1/19/2017	9:00 AM	D002	PROCESS SERVE ISSUED: 01/19/2017 TO D002 (AV02)	AJA
1/19/2017	9:00 AM	D002	INDIGENT FLAG SET TO: N (AV02)	AJA
1/27/2017	9:14 AM	EMISC	RETURN ON SERVICE - SERVED E-FILED	LEO019
1/27/2017	3:32 PM	D002	SERVICE OF PROCESS SERVE ON 01/24/2017 FOR D002	LOH
2/23/2017	10:20 AM	EMISC	RETURN ON SERVICE - SERVED E-FILED	LEO019
2/24/2017	11:58 AM	D001	SERVICE OF PROCESS SERVE ON 02/09/2017 FOR D001	LOH
2/24/2017	12:15 PM	EANSW	D002 - COMPLAINT DENIED E-FILED.	MIL011
2/24/2017	12:16 PM	D002	LISTED AS ATTORNEY FOR D002: MILLER PAUL ALBERT	AJA
2/24/2017	12:16 PM	D002	LISTED AS ATTORNEY FOR D002: FRANKLIN PATRICK WAY	AJA
2/24/2017	12:16 PM	D002	ANSWER OF COMP DENIED ON 02/24/2017 FOR D002(AV02)	AJA
2/24/2017	12:16 PM	EDISC	NOTICE OF DISCOVERY E-FILED.	MIL011
3/3/2017	3:26 PM	EANSW	D001 - COMPLAINT DENIED E-FILED.	MIL011
3/3/2017	3:27 PM	EDISC	NOTICE OF DISCOVERY E-FILED.	MIL011
3/3/2017	3:28 PM	D001	LISTED AS ATTORNEY FOR D001: MILLER PAUL ALBERT	AJA
3/3/2017	3:28 PM	D001	LISTED AS ATTORNEY FOR D001: FRANKLIN PATRICK WAY	AJA
3/3/2017	3:28 PM	D001	ANSWER OF COMP DENIED ON 03/03/2017 FOR D001(AV02)	AJA
3/6/2017	12:43 PM	EDISC	NOTICE OF DISCOVERY E-FILED.	LEO019



END OF THE REPORT



ELECTRONICALLY FILED  
1/19/2017 8:59 AM  
01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

State of Alabama  
Unified Judicial System  
Form ARCiv-93 Rev.5/99

**COVER SHEET**  
**CIRCUIT COURT - CIVIL CASE**  
(Not For Domestic Relations Cases)

Ca: 01  
Date of Filing: 01/19/2017  
Judge Code:

**GENERAL INFORMATION**

**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**  
**ANGELA PAGE ET AL v. SAHDEV DHALIWAL TRANSPORT, INC ET AL**

**First Plaintiff:** ☐ Business ☒ Individual ☐ Government ☐ Other  
**First Defendant:** ☒ Business ☐ Individual ☐ Government ☐ Other

**NATURE OF SUIT:** Select primary cause of action, by checking box (check only one) that best characterizes your action:

**TORTS: PERSONAL INJURY**

- ☐ WDEA - Wrongful Death  
☐ TONG - Negligence: General  
☒ TOMV - Negligence: Motor Vehicle  
☐ TOWA - Wantonness  
☐ TOPL - Product Liability/AEMLD  
☐ TOMM - Malpractice-Medical  
☐ TOLM - Malpractice-Legal  
☐ TOOM - Malpractice-Other  
☐ TBFM - Fraud/Bad Faith/Misrepresentation  
☐ TOXX - Other: \_\_\_\_\_

**TORTS: PERSONAL INJURY**

- ☐ TOPE - Personal Property  
☐ TORE - Real Property

**OTHER CIVIL FILINGS**

- ☐ ABAN - Abandoned Automobile  
☐ ACCT - Account & Nonmortgage  
☐ APAA - Administrative Agency Appeal  
☐ ADPA - Administrative Procedure Act  
☐ ANPS - Adults in Need of Protective Service

**OTHER CIVIL FILINGS (cont'd)**

- ☐ MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve  
☐ CVRT - Civil Rights  
☐ COND - Condemnation/Eminent Domain/Right-of-Way  
☐ CTMP - Contempt of Court  
☐ CONT - Contract/Ejectment/Writ of Seizure  
☐ TOCN - Conversion  
☐ EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division  
☐ CVUD - Eviction Appeal/Unlawful Detainer  
☐ FORJ - Foreign Judgment  
☐ FORF - Fruits of Crime Forfeiture  
☐ MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition  
☐ PFAB - Protection From Abuse  
☐ FELA - Railroad/Seaman (FELA)  
☐ RPRO - Real Property  
☐ WTEG - Will/Trust/Estate/Guardianship/Conservatorship  
☐ COMP - Workers' Compensation  
☐ CVXX - Miscellaneous Circuit Civil Case

**ORIGIN:** F ☒ INITIAL FILING

A ☐ APPEAL FROM DISTRICT COURT

O ☐ OTHER

R ☐ REMANDED

T ☐ TRANSFERRED FROM OTHER CIRCUIT COURT

**HAS JURY TRIAL BEEN DEMANDED?** ☒ YES ☐ NO

**Note:** Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P., for procedure)

**RELIEF REQUESTED:** ☒ MONETARY AWARD REQUESTED ☐ NO MONETARY AWARD REQUESTED

**ATTORNEY CODE:**

LEO019

1/19/2017 8:59:15 AM

Date

/s/ JEFFREY PHILLIPS LEONARD

Signature of Attorney/Party filing this form

**MEDIATION REQUESTED:** ☐ YES ☐ NO ☒ UNDECIDED



ELECTRONICALLY FILED  
1/19/2017 8:59 AM  
01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

ANGELA PAGE; and ANGELA PAGE as  
Mother and Next Friend of MIRACLE  
MCKINSTRY, a Minor,

Plaintiffs,

vs.

SAHDEV DHALIWAL TRANSPORT, INC.,  
d/b/a SD Transport; AHNED SAEED; and  
FICTITIOUS Defendants "1-12,"

Defendants.

}  
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}  
}  
}

Civil Action No. \_\_\_\_\_

Jury Trial Demanded

**COMPLAINT**

COME NOW, Plaintiffs Angela Page, for herself and as Mother and Next Fried of Miracle McKinstry, a Minor, and sets forth this Complaint against Defendants Sahdev Dhaliwal Transport, Inc., d/b/a SD Transport, Ahned Saeed and Fictitious Defendants 1-12, stating as follows:

1. Plaintiff Angela Page is an adult resident citizen of Jefferson County, Alabama. Plaintiff Page brings this suit on her own behalf and as Mother and Next Fried of her adopted daughter, Miracle McKinstry, a minor.

2. Defendant Sahdev Dhaliwal Transport, Inc. d/b/a SD Transport is the owner and operator of the semi-trailer tractor truck involved in the incident made the basis of this Complaint. Sahdev Dhaliwal Transport, Inc. is a corporation doing business in and operating on the roads and highways within the state of Alabama and was doing so on the date of the incident made the basis of this Complaint.

3. Defendant, Ahned Saeed, is an adult and was the driver of the truck at the time of the motor vehicle collision made the basis of the Complaint. At all times relevant to the claims



made in this Complaint, Ahned Saeed was the agent, apparent agent and/or employee of Sahdev Dhaliwal Transport, Inc. d/b/a SD Transport.

4. Fictitious Defendants “1 through 12,” whether singular or plural, individual or corporation, who are either corporations or other entities that participated in the conduct that led to Plaintiffs’ injuries. There may be other entities whose true names and identities are unknown to the Plaintiff at this time who may be legally responsible for the claim(s) set forth herein who may be added by amendment by the Plaintiffs when their true names and identities are accurately ascertained by further discovery. Until that time, the Plaintiff will designate these parties in accordance with A.R.C.P. 9(h). The word entity as used herein is intended to refer to and include any and all forms of individuals, partnerships, any and all types of corporations and unincorporated associations. The symbol by which these party defendants are designated is intended to include more than one in the event that discovery reveals that the descriptive characterization of the symbol applies to more than one “entity.” In the present action, the party defendants which the Plaintiff must include by descriptive characterization are as follows: FICTITIOUS DEFENDANT NO. 1: the proper legal designation for Defendant Sahdev Dhaliwal Transport, Inc.; FICTITIOUS DEFENDANT NO. 2: the proper legal designation for Defendant SD Transport; FICTITIOUS DEFENDANT NO. 3: the proper legal designation for Defendant Ahned Saeed; FICTITIOUS DEFENDANT NO. 4: whether singular or plural being that individual(s), entity or entities who or which owned, operated and/or maintained the tractor-trailer that is involved in the incident made the basis of this Complaint; FICTITIOUS DEFENDANT NO. 5: whether singular or plural being that individual(s), entity or entities that employed or controlled defendant Ahned Saeed at the time of the incident made the basis of this Complaint; FICTITIOUS DEFENDANT NO. 6: whether singular or plural being that individual(s), entity or entities whose

breach of contract or warranty or other acts, including negligent design or manufacture, contributed to cause the incident made the basis of this suit; FICTITIOUS DEFENDANT NO. 7: whether singular or plural being that individual(s), entity or entities who or which were the master or principal of the driver of the tractor trailer involved in the incident made the basis of this suit; FICTITIOUS DEFENDANT NO. 8: whether singular or plural being that individual(s), entity or entities who or which negligently entrusted the motor vehicle(s) involved in the incident made the basis of this suit to the driver thereof at the time of said incident; FICTITIOUS DEFENDANT NO. 9: whether singular or plural being that individual(s), entity or entities on whose behalf the vehicle or vehicles involved in the collision made the basis of this suit was being operated at the time of said incident; FICTITIOUS DEFENDANT NO. 10: whether singular or plural being that individual(s), entity or entities, other than those entities described above, whose negligence or wantonness of other actionable conduct contributed to cause the incident made the basis of this suit; FICTITIOUS DEFENDANT NO. 11: whether singular or plural being that individual(s), entity or entities who or which is the successor in interest of any of those entities described above, or are the “alter ego’s” of any of the named defendants or the entities described above who failed to maintain adequate insurance or capital; FICTITIOUS DEFENDANT NO. 12: whether singular or plural being that individual(s), entity or entities who or which were the predecessor corporations of any of those entities described above.

5. Plaintiff further avers that Defendant Sahdev Dhaliwal Transport, Inc. and Fictitious Defendants are liable for the negligent, wanton and/or illegal acts, omissions and conduct of its agent or employee, Ahned Saeed, under the theory of respondeat superior.

6. On or about to-wit: March 24, 2016, on a public road, Interstate 20/59 near the Messer Airport Highway exit in Jefferson County, Alabama, Defendant Ahned Saeed was

operating a tractor truck with semi-trailer, owned by Defendant Sahdev Dhaliwal Transport, Inc., and negligently, wantonly and/or unlawfully left his lane of travel, entered into Plaintiffs' lane of travel and collided into the side of Plaintiff Angela Pages' vehicle. At the time, Plaintiff Miracle McKinstry was a passenger in Plaintiff Angela Page's vehicle. In violation of the laws of Alabama, Defendant Saeed negligently and/or wantonly failed to keep a lawful lookout, failed to maintain his lane and otherwise acted wrongfully. Upon information and belief, he was also traveling in excess of the prudent speed for the area of the collision and under the circumstances, considering the weather and visibility, immediately prior to impact. Defendant Saeed operated his vehicle in a careless, reckless and wanton manner in the manner set forth above as well as other ways that may be revealed in discovery. As a direct and proximate result of Defendants' aforementioned negligent and/or wanton conduct, his truck suddenly and without warning, slammed into the side of Plaintiffs' vehicle with such force to cause extensive damage to both vehicles, causing Plaintiffs' vehicle to lose control, collide with a third vehicle and then against a concrete barricade.

7. Plaintiffs further aver that the Defendants, named and fictitious, were negligent, wanton and/or reckless in the use and operation of Defendants' vehicle. The negligent and/or wanton use and operation of the Defendants' vehicle caused the Defendant's vehicle to collide with Plaintiff's vehicle. As a proximate consequence of Defendants' conduct, Angela Page and Miracle McKinstry were injured, with Angela Page suffering severe, debilitating and permanent injuries, with both Plaintiffs incurring medical bills and suffering from mental anguish, pain and suffering, other economic damages, and all other damages recognized by law.

8. Plaintiff further avers that Defendants, named and fictitious, are liable as a result of its negligent hiring, negligent training, negligent supervision, negligent retention and negligent

entrustment of its truck to its agent, Defendant Saeed. Plaintiff further avers that Defendants, named and Fictitious are liable as a result of their negligent leasing, negligent maintenance and negligent entrustment of its truck to Defendant Saeed.

9. Defendants, named and fictitious were negligent and/or wanton in their inspection, maintenance and/or use of the tractor truck/semi-trailer in other ways that proximately caused injury and damage to the Plaintiffs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs demand judgment against these Defendants, named and fictitious, jointly and severally, for that amount of compensatory and punitive damages as a jury may assess after a full and fair consideration of the facts.

/s/ Jeffrey P. Leonard

Jeffrey P. Leonard [LEO-019]

Attorney for Plaintiff

*Of Counsel:*

HENINGER GARRISON DAVIS, LLC  
2224 1<sup>ST</sup> Avenue North  
Post Office Box 11310 (35202)  
Birmingham, Alabama 35203  
205.326.3336 (phone)  
205.326.3332 (facsimile)

**JURY DEMAND**

Plaintiff hereby demands trial by struck jury on all issues raised herein.

/s/ Jeffrey P. Leonard

Jeffrey P. Leonard [LEO-019]

Attorney for Plaintiff

Defendants' Address:            **SERVE DISCOVERY WITH SUMMONS AND  
COMPLAINT**

**SAHDEV DHALI WAL TRANSPORT INC.**

c/o Harwinder Singh Dhaliwal  
15006 Danube Way  
Haymarket, VA 20169

**AHNED SAEED**

3324 Valley Brook Place, Apt. 3361  
Decatur, GA 30033



ELECTRONICALLY FILED  
1/19/2017 8:59 AM  
01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

ANGELA PAGE; and ANGELA PAGE as  
Mother and Next Fried of MIRACLE  
MCKINSTRY, a Minor,

Plaintiffs,

vs.

SAHDEV DHALI WAL TRANSPORT, INC.,  
d/b/a SD Transport; AHNED SAEED; and  
FICTITIOUS Defendants "1-12,"

Defendants.

Civil Action No. \_\_\_\_\_

Jury Trial Demanded

**PLAINTIFF'S FIRST INTERROGATORIES & REQUEST FOR PRODUCTION OF  
DOCUMENTS TO DEFENDANTS**

COMES NOW the Plaintiff Angela Page, for herself and as Mother and Next Fried of Miracle McKinstry, a Minor, in the above-styled cause, and hereby propounds this First Set of Discovery (Interrogatories and Requests for the Production of Documents) to Defendants (i) Sahdev Dhaliwal Transport, Inc., d/b/a SD Transport, and (ii) Ahned Saeed, to be answered separately by each defendant, pursuant to Alabama Rules of Civil Procedure:

**DEFINITIONS AND INSTRUCTIONS**

For the purpose of these interrogatories the term "identify", when used in respect to an individual, means to state the individual's name, address, employer, and job title, and "identify", when used in respect to an entity, means to state the entity's name and address.

"You" and "your" means the defendant to whom these requests are directed and all of its present or former agents or employees; all of its attorneys; and all other persons acting or purporting to act on behalf of the Defendant to whom this discovery is directed.

As used in these interrogatories, the term “document” means without limitation, the following items, whether printed, recorded, or reproduced by any other mechanical process or produced by hand: Agreements, communications, state and federal government hearings and reports, correspondence, telegrams, memoranda, summaries or records of personal conversations or interviews, diaries, graphs, reports, notebooks, note charts, plans, drawings, sketches, maps, summaries or reports of meetings or conferences, summaries of reports of investigations of negotiations, opinions or reports of consultants, photographs, motion picture film, brochures, pamphlets, advertisements, circulars, press releases, drafts, letters, any marginal comments appearing on any documents, and any and all other writings in the possession of the Defendant, or subject to your custody and control, whether they are in your possession or in the possession of your attorney(s) or your representative(s) or in any of your offices.

If you withhold any document or answer from discovery, including on the bases of attorney-client privilege or work product doctrine, produce a privilege log describing the basis of withholding and sufficient information for each item withheld so that the undersigned can determine the legitimacy of such basis for withholding.

NOTE: These interrogatories should be deemed continuing in nature, and Plaintiff requests that you update your responses periodically to reflect any information obtained after your initial responses are made. Please be advised that in any event you attempt to call witnesses or present as evidence any persons or documents which have not been properly identified by you, Counsel for the Plaintiff may object to admissibility.

**INTERROGATORIES**

1. Please state whether this defendant have been properly designated by name as a party defendant to this lawsuit. If not, please state the correct and proper designation of this defendant.
2. State your current address.
3. State the name, address, title and duties of the person answering these interrogatories and the place where the interrogatories were answered.
4. Please identify (by make, model and color) the vehicle that was involved in this collision, state the name(s) of the owner of such vehicle and any identifying numbers assigned to the vehicle by any governmental agency, including the Department of Transportation.
5. Was Defendant Saeed or the subject vehicle covered by any policy of insurance at the time of the incident made the basis of this suit? If so, please state the name of insurance company, type of insurance and limits of such policy.
6. Did this Defendant have any conversation with any of the drivers that were involved in this collision at the scene of this incident? If so, please explain in detail the substance of any such conversations.
7. Was Defendant Saeed employed at the time of the incident made the basis of this Complaint? If so, please state the name of employer, position and years of employment.
8. Please list all witnesses known to this Defendant to have any information concerning the collision made the basis of this suit by stating their names, addresses and telephone numbers and a detailed statement of the information known by each.



9. Please state in detail the manner in which this Defendant believes the collision occurred, including the time, date, location and all information relating to how or why this incident occurred.

10. Please state the name(s) of any experts expected to testify during the trial of this issue, providing a summary of such opinions and facts for such opinions, and state any books, treatises, periodicals, publications, or standards this expert intends to rely upon in forming those opinions.

11. Does this defendant contend Plaintiff or any third party was guilty of any negligence or otherwise caused or contributed to the incident made the basis of plaintiff's complaint? If so, describe in detail the factual basis of your contention.

12. Give the purpose and destination of defendant's trip on the day of the incident made the basis of plaintiffs' complaint, including, but not limited to, where you were coming from and where you were going (providing name and addresses of same).

13. List all activities, destinations, stops, and travel on the day of the incident made the basis of plaintiffs' complaint.

14. Has this defendant's license ever been revoked? If so, please state in detail the circumstances for revocation, date of revocation and state of revocation.

15. Has this defendant ever been arrested or charged with any crimes, including moving vehicle violations? If so, please state in detail the circumstances of the charge, arrest, date of charge, date of arrest, state of charge, felony or misdemeanor, forum and case number of the proceeding, and the outcome.

16. Please state all illicit drugs, prescription drugs, over-the-counter medications, alcohol or any other mind-altering items taken by this defendant within the 72 hours preceding the collision that is the subject of this action, providing the amount taken and time/date of ingestion.

17. Were there any problems or defective parts or systems of the semi-trailer truck that may have caused or contributed to the incident made basis of this suit?

18. State the name, address and title of every officer, owner, employee, independent contractor or driver for Sahdev Dhaliwal Transport, Inc., d/b/a SD Transport, from January 1, 2015 to present.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS OR THINGS**

#### **General Document Requests**

1. Any and all documents relating to the Plaintiffs and/or the motor vehicle collision of March 24, 2016, which is the basis of this lawsuit.
2. Any document prepared during the regular course of business as a result of the occurrence complained of in Plaintiff's Complaint.
3. All photographs, videos, drawings, or descriptions of the scene of the incident made the basis of this suit.
4. All reports made to insurance companies or government agencies about the incident made the basis of this Complaint.
5. Any photographs taken regarding the vehicles, the scene, or any other matter relevant to the occurrence.
6. Any video surveillance or imaging of the Plaintiff.
7. The employee handbook issued to Defendant Ahned Saeed (hereinafter "Saeed").
8. Any safety manuals in effect at the time of the occurrence.
9. Any driver's manuals in effect at the time of the occurrence.

10. All insurance policies, including liability, general liability, excess umbrella for the vehicle, and any other insurance that will, or may, cover the occurrence. This request seeks all declarations pages, fully policy language and terms and any endorsements.
11. A copy of the driver's manual or handbook issued to Defendant Saeed.
12. All documents identified in your Answers to Interrogatories, as well as any documents provided by any party to this lawsuit in their Answers to Interrogatories.
13. All written, recorded, or signed statements of any party, including the Plaintiff, Defendants, witnesses, investigators or agents, representatives or employees of the parties concerning the subject matter of this action.
14. All photographs, videotapes or audio tapes, x-rays, diagrams, medical records, surveys or other graphic representations of information concerning the subject matter of this action, the Plaintiff or property damage.
15. Any documents received pursuant to any subpoena requests.
16. Copies of any treatise, standards in the industry, legal authority, rule, case, statute or code that will be relied upon in the defense of this case.

#### **Documents Regarding Defendant Driver**

17. The entire personnel file of Defendant Ahned Saeed (hereinafter "Saeed").
18. The entire human resources file of Defendant Saeed.
19. Defendant Saeed's employment application and any notes or documentation regarding his interview for employment.
20. The entire qualification file or any file regarding any investigation into the qualifications of the Defendant Saeed before he was hired or retained.
21. Reports received or generated regarding Defendant Saeed's safety record before he was hired.
22. Reports received or generated regarding Defendant Saeed's safety record after Defendant Saeed was hired.
23. Reports received or generated regarding Defendant Saeed's criminal background check before he was hired
24. Reports received or generated regarding Defendant Saeed's criminal background check before after he was hired.

25. Defendant Saeed's driving record secured by this Defendant before he was hired.
26. Defendant Saeed's driving record secured by this Defendant at any time after he was hired.
27. Any documents regarding Defendant Saeed's employment history.
28. Documentation regarding any contact with any prior employers of Defendant Saeed prior to hiring Defendant Saeed.
29. All medical documentation in your possession regarding the health of Defendant Saeed including but not limited to any physicals, drug testing, vision testing, etc. or regarding Defendant Saeed's physical condition at any time while employed by this Defendant.
30. Any and all documents regarding any safety tests taken by Defendant Saeed.
31. The results of any safety tests taken by Defendant Saeed.
32. Any and all documents regarding any reprimands, criticisms, or complaints as to Defendant Saeed at any time he was employed by this Defendant.
33. A copy of Defendant Saeed's driver's license.
34. Documents regarding the completion, attempts or non-completion of any driving programs attended by Defendant Saeed.
35. The entire drug and alcohol file of Defendant Saeed including, but not limited to, pre-employment, post-occurrence, random, reasonable suspicion and return to duty drug and alcohol testing results.
36. Any and all payroll and benefit records for Defendant Saeed.
37. The entire safety performance file for Defendant Saeed.
38. Any and all records of health insurance claims, disability claims, sickness or doctors' excuses or the entire medical records chart of the Defendant Saeed for three (3) years prior to the occurrence
39. All logs - official or unofficial - of Defendant Saeed for six (6) months prior to and thirty (30) days after the subject collision.
40. Any and all state safety audits of Defendant Saeed.
41. Any and all federal occurrence reports filed by Defendant Saeed for the year 2016 and for three (3) years prior to the occurrence.
42. All of the records of Defendant Saeed for the seven (7) days prior to the occurrence and for the day of the occurrence, which documents you are required to retain under 49

C.F.R. §395.8 (k) and subsequent DOT guidance and interpretation of “supporting documents”:

- a. Bills of lading;
- b. Carrier pros;
- c. Freight bills;
- d. Dispatch records;
- e. Driver call-in records;
- f. Gate record receipts;
- g. Weight/scale tickets;
- h. Fuel billing statements;
- i. Toll receipts;
- j. International registration plan receipts;
- k. International fuel tax agreement receipts;
- l. Trip permits;
- m. Lessor settlement sheets;
- n. Port of entry receipts;
- o. Cash advance receipts;
- p. Delivery receipts;
- q. Lumper receipts;
- r. Interchange and inspection reports;
- s. Over/short and damage reports;
- t. Agricultural inspection reports;
- u. Commercial Vehicle Safety Alliance reports;
- v. Occurrence reports;
- w. Telephone billing statements;
- x. Credit card receipts;
- y. Driver fax reports;
- z. On-board computer reports;
- aa. Border crossing reports;
- bb. Custom declarations;
- cc. Traffic citations;
- dd. Overweight/oversize reports and citations; and

ee. And/or other documents directly related to the motor carrier's operation which are retained by the motor carrier in connection with the operation of its transportation business.

43. Any and all cellular and telephone records, including bills of Defendant Saeed, for the day of the occurrence and seven (7) days prior and seven (7) days after.
44. Copies of any and all fuel tax reports of Defendant Saeed for the month of the occurrence.
45. Any and all DOT inspection reports filed by Defendant Saeed for the year of the occurrence and three (3) years prior.
46. Any and all long form DOT physicals of Defendant Saeed.
47. Any and all Seven Day Prior Forms or Eight Day Prior Forms for Defendant Saeed for the month of this collision.
48. Any documents in your possession regarding any insurance coverage for Defendant Saeed.
49. Produce any other file or documents regarding Defendant Saeed not previously requested above.

#### **Documents Relative to the Vehicle Involved**

50. Any and all DOT and State inspections of the vehicle involved in the occurrence for the year of the occurrence and one (1) year prior.
51. All documents, including routine or non-routine inspection, maintenance and/or repair logs and other documents, relating to maintenance of the vehicle (driven by Defendant Saeed) involved in the incident made the basis of this lawsuit.
52. All documents and tangible items, including photographs, relating to lighting devices, reflectors and visibility aids on the subject semi-tractor trailer.
53. Produce copies of any and all satellite communications and e-mail for the day of the occurrence and seven (7) days prior, as well as all recorded ECM data with reference to all data available, including:
  - a. trip distance;
  - b. total vehicle driving time;
  - c. load factor;

- d. vehicle speed limit;
  - e. maximum vehicle speed recorded;
  - f. number of hard brake incidents;
  - g. current engine speed (rpm);
  - h. maximum and minimum cruise speed limits;
  - i. total vehicle driving distance;
  - j. fuel consumption (gal./hr.);
  - k. idle time;
  - l. engine governed speed;
  - m. maximum engine speed recorded;
  - n. current throttle position;
  - o. brake switch status (on/off);
  - p. odometer;
  - q. trip driving time;
  - r. overall fuel economy (MPG);
  - s. average driving speed;
  - t. number of engine overspeeds;
  - u. number of vehicle overspeeds;
  - v. current vehicle speed (MPH);
  - w. clutch switch status (on/off); and
  - x. clock.
54. All documents relating to information recorded by any type of Global Positioning System, such as Qualcomm, Highway Master, XATA or other such systems, regarding all vehicles driven by Defendant Saeed for the period January 1, 2016 to March 24, 2016.
  55. All documents relating to information recorded by any type of Video Recording System, such as DriveCam, Safety Vision, or other such systems, regarding all vehicles driven by Defendant Saeed for the period January 1, 2016 to March 24, 2016.
  56. All documents relating to information recorded by any type of Radar Collision Warning System, such as VORAD or other such systems, regarding all vehicles driven by Defendant Saeed for the period January 1, 2016 to March 24, 2016.

57. All documents relating to information recorded by any type of Accelerometer Recording System, such as Independent Witness, Inc.'s Witness or other such systems, regarding all vehicles driven by Defendant Saeed for the period January 1, 2016 to March 24, 2016.
58. Copies of any and all printouts and copies of any and all electronic files of data imaged (i.e., downloaded) from the Electronic Control Module (ECM) for any vehicle involved in the occurrence.
59. Copies of any and all printouts and copies of any and all electronic files of data imaged (i.e., downloaded) from the Airbag Control Module (ACM), Powertrain Control Module (PCM), and Roll Over Sensor (ROS) for any vehicle involved in the occurrence.
60. Copies of any and all printouts and copies of any and all electronic files of data imaged (i.e., downloaded) from any and all Event Data Recorded (EDR) relating to any of the vehicles involved in the occurrence. An EDR means a device or function in a vehicle or remote of the vehicle that records any vehicle or occupant-based data just prior to or during a crash, such that the data can be retrieved after the crash.
61. The Permanent Unit File or its equivalent including, but not limited to, records relating to the repairs, maintenance, and costs for the vehicle involved in the occurrence.

#### **Expert Witness Documentation**

62. All notes, correspondence, bills, invoices, diagrams, photographs, x-rays or other documents prepared or reviewed by each person whom you expect to call as an expert witness at trial.
63. All written reports of each person whom you expect to call as an expert witness at trial, including any drafts.
64. All documents upon which any expert witness you intend to call at trial relied to form an opinion.
65. All invoices generated by expert witnesses for performing all expert witness services to Defendants, including but not limited to, the fees for the medical examination, the records review, the pretrial preparation, any telephone conference, any trial testimony anticipated and any other fee paid by the Defendants for expert fees.



66. Any and all correspondence exchanged between counsel for this Defendant and any expert.
67. Any expert's current fee schedule.
68. The most recent resume or curriculum vitae of each expert whom you expect to call as an expert witness at trial.
69. Any list kept by any expert of that expert's testimony by way of deposition or trial testimony.
70. Any and all 1099 forms for any expert that demonstrates the source(s) of payment(s) to the expert, or the expert's practice, from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of any defense law firm or insurance company.
71. Any and all Quickbooks or other similar accounting tools used to document sources of payments made to the experts, or the expert's practice, from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of any defense law firm or insurance company.
72. Any and all tax returns for any expert that demonstrates the source(s) of payment(s) to the doctor from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of any defense law firm or insurance company. All other personal information is NOT requested and may be redacted.

#### **Contracts and Leases**

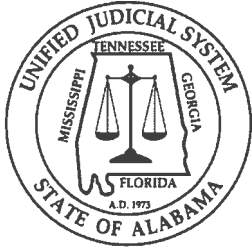
73. Any lease agreements and/or contracts that were in effect at the time of the occurrence between this Defendant and any other Defendant or entity regarding the scope and use of the vehicle involved in the occurrence.
74. Any contracts between this Defendant and any other Defendant or entity regarding indemnification or contribution for claims arising out of the occurrence.
75. Any releases, Mary Carter agreements, or any other documents which serve to limit, reduce or modify your potential liability in this matter or your potential joint and several share of any judgment that may be entered in this matter.

76. Any documents regarding the existence of insurance coverage for the occurrence, any reservation of rights, or any other documents regarding any diminution or modification of any insurance coverage that may potentially cover any judgment entered as a result of the occurrence.
77. All documents, not requested above, that relate to the Plaintiffs, the driver (Ahned Saeed) or the collision made the basis of this action.

/s/ Jeffrey P. Leonard  
JEFFREY P. LEONARD (LEO-019)  
*Attorney for Plaintiff*

*Of Counsel:*  
HENINGER GARRISON DAVIS, LLC  
2224 1<sup>ST</sup> Avenue North  
Birmingham, Alabama 35203  
205.326.3336 (phone)  
205.326.3332 (facsimile)

**PLEASE SERVE WITH SUMMONS AND COMPLAINT**



## AlaFile E-Notice

01-CV-2017-900207.00

To: JEFFREY PHILLIPS LEONARD  
jleonard@hgdllawfirm.com

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

The following complaint was FILED on 1/19/2017 8:59:23 AM

Notice Date: 1/19/2017 8:59:23 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
716 N. RICHARD ARRINGTON BLVD.  
BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: SAHDEV DHALI WAL TRANSPORT, INC  
C/O HARWINDER S. DHALI WAL  
15006 DANUBE WAY  
HAYMARKET, VA, 20169

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALI WAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

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BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: AHMED SAEED  
3324 VALLEY BROOK PLACE  
APT. 3361  
DECATUR, GA, 30033

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

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01-CV-2017-900207.00

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205-325-5355  
anne-marie.adams@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Case Number:</b> <b>01-CV-2017-900207.00</b>
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY  
 ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL

SAHDEV DHALIWAL TRANSPORT, INC, C/O HARWINDER S. DHALIWAL 15006 DANUBE WAY, HAYMARKET, VA 20169

**NOTICE TO** \_\_\_\_\_

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY JEFFREY PHILLIPS LEONARD

WHOSE ADDRESS IS 2224 1ST AVENUE NORTH, BIRMINGHAM, AL 35203

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☒ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☐ Service by certified mail of this summons is initiated upon the written request of \_\_\_\_\_

pursuant to the Alabama Rules of the Civil Procedure

Date 1/19/2017 8:59:23 AM      /s/ ANNE-MARIE ADAMS

Clerk/Register

JEFFERSON COUNTY, ALABAMA

716 N. RICHARD ARRINGTON BLVD.

BIRMINGHAM, AL 35203

☐ Certified Mail is hereby requested \_\_\_\_\_

Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	_____
		Phone Number of Server _____

State of Alabama Unified Judicial System Form C-34 Rev 6/88	<b>SUMMONS</b> <b>- CIVIL -</b>	Case Number: <b>01-CV-2017-900207.00</b>
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY  
 ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL

AHNED SAEED, 3324 VALLEY BROOK PLACE APT. 3361, DECATUR, GA 30033

**NOTICE TO** \_\_\_\_\_

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WHOSE ADDRESS IS 2224 1ST AVENUE NORTH, BIRMINGHAM, AL 35203

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 pursuant to the Alabama Rules of the Civil Procedure

Date 1/19/2017 8:59:23 AM /s/ ANNE-MARIE ADAMS  
 Clerk/Register  
 JEFFERSON COUNTY, ALABAMA  
 716 N. RICHARD ARRINGTON BLVD.  
 BIRMINGHAM, AL 35203

☐ Certified Mail is hereby requested \_\_\_\_\_  
 Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☐ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County, Alabama on \_\_\_\_\_ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	Phone Number of Server _____



ELECTRONICALLY FILED  
1/27/2017 9:14 AM  
01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

State of Alabama  
Unified Judicial System  
Form C-34 Rev 6/88

**SUMMONS  
- CIVIL -**

Case Num  
01-CV-20

IN THE CIRCUIT COURT OF JEFFERSON COUNTY  
ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL

NOTICE TO

AHNED SAEED, 3324 VALLEY BROOK PLACE APT. 3361, DECATUR, GA 30033

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY JEFFREY PHILLIPS LEONARD

WHOSE ADDRESS IS 2224 1ST AVENUE NORTH, BIRMINGHAM, AL 35203

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☒ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☐ Service by certified mail of this summons is initiated upon the written request of \_\_\_\_\_ pursuant to the Alabama Rules of the Civil Procedure

Date 1/19/2017 8:59:23 AM /s/ ANNE-MARIE ADAMS

Clerk/Register

JEFFERSON COUNTY, ALABAMA

716 N. RICHARD ARRINGTON BLVD.

BIRMINGHAM, AL 35203

☐ Certified Mail is hereby requested

Plaintiffs/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☒ I certify that I personally delivered a copy of the Summons and Complaint to

Ahned Saeed

in DeKalb

County, Georgia

on 1/24/17

(Date)

Date

Server's Signature

Address of Server

Private Process Server  
Type of Server

Kevin Lewis  
Server's Printed Name

MLQ ATTORNEY SERVICES  
2000 RIVEREDGE PARKWAY NW  
SUITE 885  
ATLANTA, GA 30328  
Phone Number of Server  
1-800-446-8794



538380





## AlaFile E-Notice

01-CV-2017-900207.00

To: JEFFREY PHILLIPS LEONARD  
jleonard@hgdllawfirm.com

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

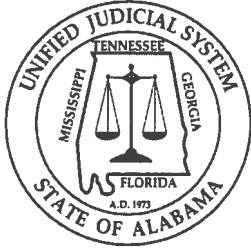
ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

The following RETURN ON SERVICE - SERVED was FILED on 1/27/2017 9:15:00 AM

Notice Date: 1/27/2017 9:15:00 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
716 N. RICHARD ARRINGTON BLVD.  
BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: SAHDEV DHALI WAL TRANSPORT, INC (PRO SE)  
C/O HARWINDER S. DHALI WAL  
15006 DANUBE WAY  
HAYMARKET, VA, 20169-0000

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

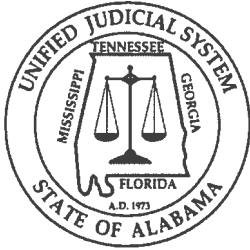
ANGELA PAGE ET AL V. SAHDEV DHALI WAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

The following RETURN ON SERVICE - SERVED was FILED on 1/27/2017 9:15:00 AM

Notice Date: 1/27/2017 9:15:00 AM

ANNE-MARIE ADAMS  
CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
716 N. RICHARD ARRINGTON BLVD.  
BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: SAEED AHMED (PRO SE)  
3324 VALLEY BROOK PLACE  
APT. 3361  
DECATUR, GA, 30033-0000

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

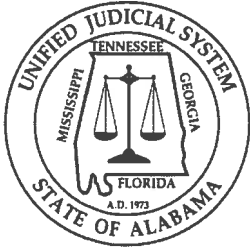
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## AlaFile E-Notice

01-CV-2017-900207.00

To: JEFFREY PHILLIPS LEONARD  
jleonard@hgdlawfirm.com

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

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anne-marie.adams@alacourt.gov



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2/23/2017 10:20 AM  
01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

State of Alabama  
Unified Judicial System  
Form C-34 Rev 8/88

**SUMMONS  
- CIVIL -**

**Case Number:**  
**01-CV-2017-900207.00**

IN THE CIRCUIT COURT OF JEFFERSON COUNTY  
ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL

**NOTICE TO**

SAHDEV DHALIWAL TRANSPORT, INC, C/O HARWINDER S. DHALIWAL 15006 DANUBE WAY, HAYMARKET, VA 20169

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY JEFFREY PHILLIPS LEONARD

WHOSE ADDRESS IS 2224 1ST AVENUE NORTH, BIRMINGHAM, AL 35203

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☒ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☐ Service by certified mail of this summons is initiated upon the written request of \_\_\_\_\_ pursuant to the Alabama Rules of the Civil Procedure

Date 1/19/2017 8:59:23 AM /s/ ANNE-MARIE ADAMS

Clerk/Register

JEFFERSON COUNTY, ALABAMA

716 N. RICHARD ARRINGTON BLVD.

BIRMINGHAM, AL 35203

☐ Certified Mail is hereby requested

\_\_\_\_\_  
Plaintiff's/Attorney's Signature

**RETURN ON SERVICE:**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_

☒ I certify that I personally delivered a copy of the Summons and Complaint to \_\_\_\_\_

\_\_\_\_\_ In Prince William County, Alabama on 2/9/2017  
Virginia (Date)

2/10/2017 Melissa Torres 18403 Woodfield Rd, Suite A  
Date Server's Signature Address of Server

Private Process Server Melissa Torres Gaithersburg, MD 20879  
Type of Server Server's Printed Name Phone Number of Server  
(301) 869-5081

01-CV-2017-900207.00

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL

C001 - ANGELA PAGE

Plaintiff

v. D001 - SAHDEV DHALIWAL TRANSPORT, INC

Defendant



**SERVICE RETURN**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: [illegible]  
[illegible]

[illegible text]

[illegible text]

[illegible text]

[illegible text]

[illegible text]

[illegible text]

[illegible text]

[illegible text]

60.683

31/07/17

[illegible text]

[illegible text]



## AlaFile E-Notice

01-CV-2017-900207.00

To: JEFFREY PHILLIPS LEONARD  
jleonard@hgdllawfirm.com

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

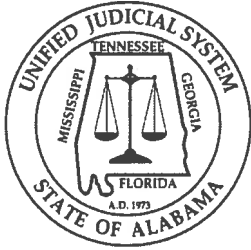
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205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: SAHDEV DHALI WAL TRANSPORT, INC (PRO SE)  
C/O HARWINDER S. DHALI WAL  
15006 DANUBE WAY  
HAYMARKET, VA, 20169-0000

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anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: JEFFREY PHILLIPS LEONARD  
jleonard@hgdllawfirm.com

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anne-marie.adams@alacourt.gov



ELECTRONICALLY FILED  
2/24/2017 12:15 PM  
01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

<b>ANGELA PAGE, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. CV17-900207</b>
	)	
<b>SAHDEV DHALIWAL TRANSPORT,</b>	)	
<b>INC., et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**ANSWER**

Comes now the defendant, Ahned Saeed, and in Answer to the Complaint filed by the plaintiffs states as follows:

1. The defendant is without sufficient information to admit or deny paragraph 1 of the Complaint and therefore demands strict proof of same.
2. The defendant, on information and belief, admits paragraph 2 of the Complaint.
3. The defendant admits paragraph 3 of the Complaint.
4. The defendant avers that paragraph 4 of the Complaint addresses fictitious parties and therefore requires no response from him.
5. The defendant denies paragraph 5 of the Complaint and demands strict proof of same.
6. The defendant denies paragraphs 6 through 9 of the Complaint and demands strict proof of same.
7. The defendant pleads not guilty.
8. The defendant avers that the plaintiffs were guilty of negligent conduct which caused or contributed to cause the accident which makes the basis of this lawsuit.

9. Insofar as the Complaint alleges a cause of action for punitive damages, the defendant would aver that punitive damages are unconstitutional as to the Constitution of the State of Alabama and the Constitution of the United States of America.

10. The defendant reserves his right to assert additional defenses, including affirmative defenses, at a later date.

11. The defendant demands trial by struck jury.

s/Paul A. Miller  
PAUL A. MILLER (MIL011)  
s/Patrick W. Franklin  
PATRICK W. FRANKLIN (FRA051)  
Attorneys for Defendant  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
Telephone: (205) 326-0000  
[pmiller@mck-law.com](mailto:pmiller@mck-law.com)  
[pfranklin@mck-law.com](mailto:pfranklin@mck-law.com)

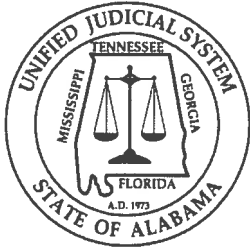
#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the below counsel by U.S. Mail and/or E-Filing on this the 24<sup>th</sup> day of February, 2017:

cc: Jeffrey P. Leonard, Esq.  
2224 1st Avenue North  
Birmingham, AL 35203

s/Paul A. Miller  
Of Counsel





## AlaFile E-Notice

01-CV-2017-900207.00

To: JEFFREY PHILLIPS LEONARD  
jleonard@hgdllawfirm.com

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

The following discovery was FILED on 3/6/2017 12:43:57 PM

Notice Date: 3/6/2017 12:43:57 PM

ANNE-MARIE ADAMS  
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JEFFERSON COUNTY, ALABAMA  
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BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: MILLER PAUL ALBERT  
pmiller@mck-law.com

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## NOTICE OF ELECTRONIC FILING

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205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: FRANKLIN PATRICK WAYNE  
pfranklin@mck-law.com

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

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205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2017-900207.00

To: PAUL A MILLER MR.  
pmiller@mck-law.com

---

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
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anne-marie.adams@alacourt.gov



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To: SAHDEV DHALIwal TRANSPORT, INC (PRO SE)  
C/O HARWINDER S. DHALIwal  
15006 DANUBE WAY  
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## AlaFile E-Notice

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To: LEONARD JEFFREY PHILLIPS  
jleonard@hgdllawfirm.com

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CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

ANGELA PAGE, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. CV17-900207
	)	
SAHDEV DHALIWAL TRANSPORT,	)	
INC., et al.,	)	
	)	
Defendants.	)	

**NOTICE TO CLERK OF FILING DISCOVERY**

**TO:** Clerk, Circuit Court

Please take notice that the following discovery document has been filed on behalf of  
**Defendant, Ahmed Saeed:**

- (X) Interrogatories;
- (X) RFP;
- (X) General Objections.

s/Paul A. Miller  
PAUL A. MILLER (MIL011)  
s/Patrick W. Franklin  
PATRICK W. FRANKLIN (FRA051)  
Attorneys for Defendant  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
Telephone: (205) 326-0000  
[pmiller@mck-law.com](mailto:pmiller@mck-law.com)  
[pfranklin@mck-law.com](mailto:pfranklin@mck-law.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the below counsel by U.S. Mail and/or E-Filing on this the 24<sup>th</sup> day of February, 2017:

cc: Jeffrey P. Leonard, Esq.  
2224 1st Avenue North  
Birmingham, AL 35203

s/Paul A. Miller  
Of Counsel



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JEFFERSON COUNTY, ALABAMA  
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**THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

ANGELA PAGE, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. CV17-900207
	)	
SAHDEV DHALIWAL TRANSPORT,	)	
INC., et al.,	)	
	)	
Defendants.	)	

**GENERAL OBJECTIONS**

Comes now the defendant, Ahned Saeed, and the files the following general objections to the plaintiffs' discovery as follows:

1. Defendant's objections to the Plaintiff's discovery requests are made without waiver of, or prejudice to, any additional objections Defendant may make.
2. All objections are hereby expressly preserved as is the right to request or move for a protective order.
3. Defendant reserves all objections as to the admissibility at trial of any information provided herein.
4. The supplying of any information does not constitute an admission by Defendant that such information is relevant in this lawsuit. All information provided by Defendant is for use in this litigation and for no other purpose.
5. Defendant objects to each and every discovery request to the extent the information called for, if any, was obtained and prepared in anticipation of litigation or for trial and Plaintiff has made no showing that they have a substantial need for the materials in the preparation of this case and that they are unable, without undue hardship, to obtain the substantial equivalent of the materials by other means. Defendant further objects to each and every discovery request to the extent that the information called for is privileged and is not discoverable under ARCP Rule 26(b)(3).
6. Defendant objects to each and every discovery request to the extent that the information called for is protected from discovery by the attorney-client privilege.
7. Defendant objects to each and every discovery request to the extent that Plaintiff seeks to vary the obligations imposed upon Defendant under the Alabama Rules of Civil Procedure.

8. Defendant objects to each and every discovery request to the extent that Plaintiff seeks information that is not relevant to the claims in this action or reasonably calculated to lead to the discovery of admissible evidence.

9. Defendant objects to each and every discovery request to the extent that Plaintiff seeks information that is equally available to Plaintiff and the burden on the Defendant to obtain the requested information is no greater than the burden on Plaintiff.

10. Defendant objects to each and every discovery request to the extent that it is vague, overly broad, oppressive, unduly burdensome and expensive and beyond the permissible scope of discovery under the Alabama Rules of Civil Procedure.

11. Defendant objects to each and every discovery request to the extent that it seeks an answer involving an opinion or contention that relates to fact or the application of law to fact before discovery has been completed or a pre-trial conference has been conducted.

12. Defendant reserves the right to supplement its responses upon completion of discovery.

s/Paul A. Miller  
PAUL A. MILLER (MIL011)  
s/Patrick W. Franklin  
PATRICK W. FRANKLIN (FRA051)  
Attorneys for Defendant  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
Telephone: (205) 326-0000  
[pmiller@mck-law.com](mailto:pmiller@mck-law.com)  
[pfranklin@mck-law.com](mailto:pfranklin@mck-law.com)

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cc: Jeffrey P. Leonard, Esq.  
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Birmingham, AL 35203

s/Paul A. Miller  
Of Counsel







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**THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

<b>ANGELA PAGE, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. CV17-900207</b>
	)	
<b>SAHDEV DHALI WAL TRANSPORT,</b>	)	
<b>INC., et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**REQUEST FOR PRODUCTION OF DOCUMENTS**

**COMES NOW** Defendant, Ahned Saeed, and propounds the following Request for Production of Documents to the plaintiffs to be answered separately and severally, pursuant to the Alabama Rules of Civil Procedure as follows:

1. Please produce all photographs of plaintiff's automobile which was involved in the accident made the basis of plaintiff's Complaint.
2. Produce all photographs of the accident scene.
3. Please produce all photographs and other documentation of plaintiff's injuries as a result of the accident described more fully in plaintiff's Complaint.
4. Produce all photographs of the vehicles involved in the accident made the basis of plaintiff's Complaint.
5. Produce any repair estimates for damages to plaintiff's vehicle involved in the accident.
6. Produce any and all documents plaintiff used in answering the previously filed Interrogatories.
7. Produce all documents regarding plaintiff's injuries and medical expenses

which the plaintiff has incurred as a result of injuries plaintiff has alleged to have sustained in the accident made the basis of the Complaint.

8. Please produce a legible copy of your state and federal tax returns for the past 5 years.

s/Paul A. Miller  
PAUL A. MILLER (MIL011)  
s/Patrick W. Franklin  
PATRICK W. FRANKLIN (FRA051)  
Attorneys for Defendant  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
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Telephone: (205) 326-0000  
[pmiller@mck-law.com](mailto:pmiller@mck-law.com)  
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**THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

<b>ANGELA PAGE, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. CV17-900207</b>
	)	
<b>SAHDEV DHALIWAL TRANSPORT,</b>	)	
<b>INC., et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**INTERROGATORIES TO THE PLAINTIFFS**

**COMES NOW** defendant, Ahned Saeed, and propounds the following Interrogatories to the plaintiffs, to be answered separately and severally, pursuant to the Alabama Rules of Civil Procedure:

1. State your full name, resident address, date of birth, social security number and driver's license number.
2. List the names and addresses of all your employers for the past 10 years with beginning and ending dates of each employment.
3. If you have ever been involved in any accident of any kind before or after the accident involved in this suit (this refers to all kinds of accidents, vehicular, slip-and-fall, on-the-job, or otherwise), state when, where and how each accident occurred and the names or identities of other people involved.
4. If you were injured in any of the above accidents, please describe your injuries in detail and state the name and addresses of any hospitals or doctors which treated you for said injuries.

5. Describe each injury you received in the accident or event described in your complaint. (In answering this question, specify the part of parts of your head, neck, back, limbs and body which were injured and specify whether each part mentioned was broken, sprained, strained, lacerated, contused or otherwise injured).

6. If you were hospitalized or treated by a physician as a result of the above described injuries, please state the name and addresses of each hospital or physician.

7. Itemize your expenses incurred by reason of the accident or event described in your complaint by giving (a) a description of each item claimed; (b) the name of the person to whom each item was paid or incurred; and (c) the amount of each item in dollars and cents. (In answering this question, list all expenses that you are claiming as damages including, but not limited to, ambulance bills, hospital bills, doctor's bills, nurses bills, drugs, medication, and other forms of treatment apparatus and appliances, transportation expenses, property damage and other items claimed).

8. Please attach to these interrogatories legible copies of any and all medical records, medical bills and any and all other written documentation which would evidence the expenses incurred for treatment of injuries sustained in this accident and written documentation evidencing the treatment, diagnosis etc. of any and all physicians who have so treated you.

9. If you are claiming loss of past earnings state how much (give your answer in dollars and cents).

10. Show how you computed your answer to the last question and please attach any written documentation which would be supportive of your lost wage claim.

11. Are you claiming loss of future earnings or earning capacity? If so, how much (give your answer in dollars and cents and show how you computed same).

12. If you had any health insurance or if any of your medical expenses have been paid for by any other type of collateral source, please state the name of the insurance company or collateral source which paid for your medical expenses, the policy number which afforded you the coverage and the amount they paid on your behalf.

13. In your Complaint, you allege that as a result of the automobile accident which makes the basis of this lawsuit, you sustained the loss of property damage. In regard to same, please provide the following:

(a) any and all documentation as to ownership of the vehicle which you occupied at the time of the accident which makes the basis of this lawsuit including but not limited to, certificate of title, purchasing documents, etc.;

(b) please itemize with specificity the monetary figure which you claim for loss of transportation and show how you calculate same;

(c) please state with specificity the reasonable market value of the automobile before the accident and the reasonable market value of the automobile after the accident;

(d) please provide any written documentation including, but not limited to, NADA evaluations, blue book evaluations, comparative market studies, etc. which support the figures of the before and after value of said automobile as cited above;

(e) please state the name, address and phone number of any expert which you have retained to testify as to the before and after value of said automobile and attach hereto a legible copy of any written reports, correspondence or other written documentation from said expert.

14. Please list the name, address and phone number of all witnesses, including expert witnesses, you anticipate calling at the trial of this cause.

15. Please list all exhibits which you intend on using at the trial of this cause.
16. Please list the name and address of any and all medical doctors and/or medical entities from whom you have sought medical treatment over the last 10 years.
17. Please provide the names, addresses and phone numbers of any and all individuals who witnessed the accident that makes the basis of this lawsuit.
18. Are you a medicare or medicaid recipient?
  - a) if so, *please provide your medicare or medicaid health insurance claim number*, and please state whether medicare or medicaid has paid any benefits to you or on your behalf for treatment which you allege relates to the accident made the basis of this lawsuit.
  - b) if you are not currently a medicare or medicaid recipient, please state whether you have ever applied for medicare or medicaid benefits, and what the outcome of that application was.
19. Did you own a cell phone at the time of the accident made the basis of this lawsuit? If so, please state the name of the provider and your cell phone number.

s/Paul A. Miller  
PAUL A. MILLER (MIL011)  
s/Patrick W. Franklin  
PATRICK W. FRANKLIN (FRA051)  
Attorneys for Defendant  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
Telephone: (205) 326-0000  
[pmiller@mck-law.com](mailto:pmiller@mck-law.com)  
[pfranklin@mck-law.com](mailto:pfranklin@mck-law.com)

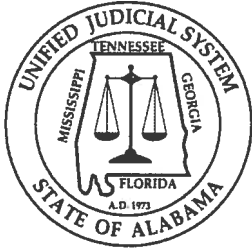
**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the below counsel by U.S. Mail and/or E-Filing on this the 24<sup>th</sup> day of February, 2017:

cc: Jeffrey P. Leonard, Esq.  
2224 1st Avenue North  
Birmingham, AL 35203

s/Paul A. Miller  
Of Counsel





## AlaFile E-Notice

01-CV-2017-900207.00

To: PAUL A MILLER MR.  
pmiller@mck-law.com

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

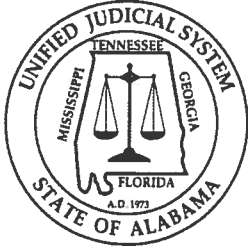
ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

The following discovery was FILED on 2/24/2017 12:17:06 PM

Notice Date: 2/24/2017 12:17:06 PM

ANNE-MARIE ADAMS  
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JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
716 N. RICHARD ARRINGTON BLVD.  
BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: SAHDEV DHALIwal TRANSPORT, INC (PRO SE)  
C/O HARWINDER S. DHALIwal  
15006 DANUBE WAY  
HAYMARKET, VA, 20169-0000

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

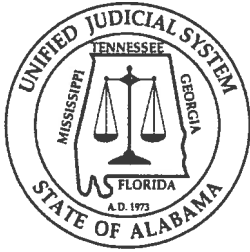
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205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: LEONARD JEFFREY PHILLIPS  
jleonard@hgdllawfirm.com

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

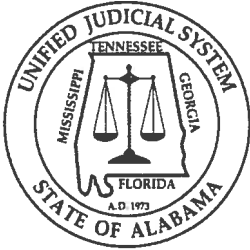
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BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: FRANKLIN PATRICK WAYNE  
pfranklin@mck-law.com

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

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205-325-5355  
anne-marie.adams@alacourt.gov



ELECTRONICALLY FILED  
3/3/2017 3:26 PM  
01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

<b>ANGELA PAGE, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. CV17-900207</b>
	)	
<b>SAHDEV DHALI WAL TRANSPORT,</b>	)	
<b>INC., et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**ANSWER**

Comes now the defendant, Sahdev Dhaliwal Transport, Inc., d/b/a SD Transport, and in Answer to the Complaint filed by the plaintiffs states as follows:

1. The defendant is without sufficient information to admit or deny paragraph 1 of the Complaint and therefore demands strict proof of same.
2. The defendant, on information and belief, admits paragraph 2 of the Complaint.
3. The defendant admits paragraph 3 of the Complaint.
4. The defendant avers that paragraph 4 of the Complaint addresses fictitious parties and therefore requires no response from him.
5. The defendant denies paragraph 5 of the Complaint and demands strict proof of same.
6. The defendant denies paragraphs 6 through 9 of the Complaint and demands strict proof of same.
7. The defendant pleads not guilty.
8. The defendant avers that the plaintiffs were guilty of negligent conduct which caused or contributed to cause the accident which makes the basis of this lawsuit.

9. Insofar as the Complaint alleges a cause of action for punitive damages, the defendant would aver that punitive damages are unconstitutional as to the Constitution of the State of Alabama and the Constitution of the United States of America.

10. The defendant reserves his right to assert additional defenses, including affirmative defenses, at a later date.

11. The defendant demands trial by struck jury.

s/Paul A. Miller  
PAUL A. MILLER (MIL011)  
s/Patrick W. Franklin  
PATRICK W. FRANKLIN (FRA051)  
Attorneys for Defendant  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
Telephone: (205) 326-0000  
[pmiller@mck-law.com](mailto:pmiller@mck-law.com)  
[pfranklin@mck-law.com](mailto:pfranklin@mck-law.com)

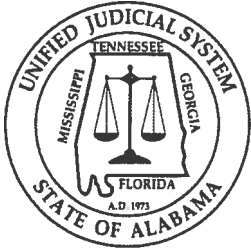
### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the below counsel by U.S. Mail and/or E-Filing on this the 3<sup>rd</sup> day of March, 2017:

cc: Jeffrey P. Leonard, Esq.  
2224 1st Avenue North  
Birmingham, AL 35203

s/Paul A. Miller  
Of Counsel





## AlaFile E-Notice

01-CV-2017-900207.00

To: PAUL A MILLER MR.  
pmiller@mck-law.com

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

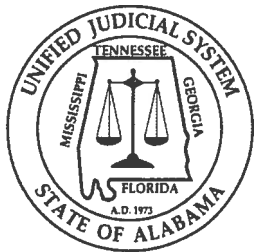
The following answer was FILED on 3/3/2017 3:26:39 PM

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CIRCUIT COURT CLERK  
JEFFERSON COUNTY, ALABAMA  
JEFFERSON COUNTY, ALABAMA  
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205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2017-900207.00

To: SAHDEV DHALI WAL TRANSPORT, INC (PRO SE)  
C/O HARWINDER S. DHALI WAL  
15006 DANUBE WAY  
HAYMARKET, VA, 20169-0000

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALI WAL TRANSPORT, INC ET AL  
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205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: LEONARD JEFFREY PHILLIPS  
jleonard@hgdllawfirm.com

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
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## AlaFile E-Notice

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To: FRANKLIN PATRICK WAYNE  
pfranklin@mck-law.com

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
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BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov



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01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

ANGELA PAGE, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. CV17-900207
	)	
SAHDEV DHALI WAL TRANSPORT,	)	
INC., et al.,	)	
	)	
Defendants.	)	

**NOTICE TO CLERK OF FILING DISCOVERY**

**TO:** Clerk, Circuit Court

Please take notice that the following discovery document has been filed on behalf of  
**Defendants, Sahdev Dhaliwal Transport, Inc. and Ahmed Saeed:**

**(X) RFA**

s/Paul A. Miller  
PAUL A. MILLER (MIL011)  
s/Patrick W. Franklin  
PATRICK W. FRANKLIN (FRA051)  
Attorneys for Defendants  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
Telephone: (205) 326-0000  
[pmiller@mck-law.com](mailto:pmiller@mck-law.com)  
[pfranklin@mck-law.com](mailto:pfranklin@mck-law.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the below counsel by U.S. Mail and/or E-Filing on this the 3<sup>rd</sup> day of March, 2017:

cc: Jeffrey P. Leonard, Esq.  
2224 1st Avenue North  
Birmingham, AL 35203

s/Paul A. Miller  
Of Counsel



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3/3/2017 3:27 PM  
01-CV-2017-900207.00  
CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

<b>ANGELA PAGE, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. CV17-900207</b>
	)	
<b>SAHDEV DHALI WAL TRANSPORT,</b>	)	
<b>INC., et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**REQUEST FOR ADMISSIONS**

Come now the defendants, Sahdev Dhaliwal Transport, Inc., d/b/a SD Transport and Ahned Saeed, and request the plaintiffs, separately and severally, to admit the following facts:

1. That you are seeking in excess of \$75,000.00 in this lawsuit.
2. That you believe your case to be worth more than \$75,000.00.
3. That your claim is worth more than the \$75,000.00 Federal Court jurisdictional limit.

s/Paul A. Miller  
PAUL A. MILLER (MIL011)  
s/Patrick W. Franklin  
PATRICK W. FRANKLIN (FRA051)  
Attorneys for Defendant  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
Telephone: (205) 326-0000  
[pmiller@mck-law.com](mailto:pmiller@mck-law.com)  
[pfranklin@mck-law.com](mailto:pfranklin@mck-law.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the below counsel by U.S. Mail and/or E-Filing on this the 3<sup>rd</sup> day of March, 2017:

cc: Jeffrey P. Leonard, Esq.  
2224 1st Avenue North  
Birmingham, AL 35203

s/Paul A. Miller  
Of Counsel



## AlaFile E-Notice

01-CV-2017-900207.00

To: PAUL A MILLER MR.  
pmiller@mck-law.com

---

## NOTICE OF ELECTRONIC FILING

---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

The following discovery was FILED on 3/3/2017 3:27:41 PM

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JEFFERSON COUNTY, ALABAMA  
716 N. RICHARD ARRINGTON BLVD.  
BIRMINGHAM, AL, 35203

205-325-5355  
anne-marie.adams@alacourt.gov





## AlaFile E-Notice

01-CV-2017-900207.00

To: SAHDEV DHALIwal TRANSPORT, INC (PRO SE)  
C/O HARWINDER S. DHALIwal  
15006 DANUBE WAY  
HAYMARKET, VA, 20169-0000

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

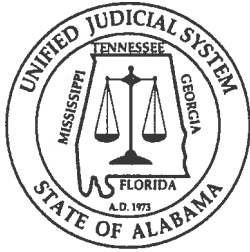
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205-325-5355  
anne-marie.adams@alacourt.gov



## AlaFile E-Notice

01-CV-2017-900207.00

To: LEONARD JEFFREY PHILLIPS  
jleonard@hgdllawfirm.com

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

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## AlaFile E-Notice

01-CV-2017-900207.00

To: FRANKLIN PATRICK WAYNE  
pfranklin@mck-law.com

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## NOTICE OF ELECTRONIC FILING

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anne-marie.adams@alacourt.gov



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3/6/2017 12:43 PM  
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CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

ANGELA PAGE; and ANGELA PAGE as  
Mother and Next Friend of MIRACLE  
MCKINSTRY, a Minor,

Plaintiffs,

vs.

SAHDEV DHALIWAL TRANSPORT, INC.,  
d/b/a SD Transport; AHMED SAEED; et al.,

Defendants.

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}  
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}  
}  
}  
}  
}  
}

Civil Action No. 2017- 900207

Jury Trial Demanded

**NOTICE OF SERVICE OF DISCOVERY**

PLEASE TAKE NOTICE that the undersigned has this date served on counsel for all parties, the following:

**1. PLAINTIFFS' RESPONSE TO REQUEST FOR ADMISSIONS**

/s/ Jeffrey P. Leonard  
JEFFREY P. LEONARD (LEO-019)  
*Attorney for Plaintiff*

*Of Counsel:*

HENINGER GARRISON DAVIS, LLC  
2224 1<sup>ST</sup> Avenue North  
Birmingham, Alabama 35203  
205.326.3336 (phone)  
205.326.3332 (facsimile)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the below counsel by U.S. Mail and/or E-Filing on this the 6th day of March, 2017:

Paul A. Miller  
Patrick W. Franklin  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
*Attorneys for Defendants*

/s/ Jeffrey P. Leonard



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CIRCUIT COURT OF  
JEFFERSON COUNTY, ALABAMA  
ANNE-MARIE ADAMS, CLERK

**IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA**

ANGELA PAGE; and ANGELA PAGE as  
Mother and Next Fried of MIRACLE  
MCKINSTRY, a Minor,

Plaintiffs,

vs.

SAHDEV DHALI WAL TRANSPORT, INC.,  
d/b/a SD Transport; AHNED SAEED; and  
FICTITIOUS Defendants "1-12,"

Defendants.

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}

Civil Action No. 2017- 900207

Jury Trial Demanded

**PLAINTIFFS' RESPONSE TO REQUEST FOR ADMISSIONS**

COMES NOW the Plaintiff Angela Page, for herself and as Mother and Next Friend of Miracle McKinstry, a Minor, in the above-styled cause, and in response to Defendants Sahdev Dhaliwal Transport d/b/a SD Transport and Ahned Saeed's Request for Admissions would say:

1. That you are seeking in excess of \$75,000.00 in this lawsuit.

RESPONSE: Admitted.

2. That you believe your case to be worth more than \$75,000.00.

RESPONSE: Admitted.

3. That your claim is worth more than the \$75,000.00 Federal Court jurisdictional limit.

RESPONSE: Admitted.

/s/ Jeffrey P. Leonard

JEFFREY P. LEONARD (LEO-019)

Attorney for Plaintiff

*Of Counsel:*

HENINGER GARRISON DAVIS, LLC  
2224 1<sup>ST</sup> Avenue North  
Birmingham, Alabama 35203  
205.326.3336 (phone)  
205.326.3332 (facsimile)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the below counsel by U.S. Mail and/or E-Filing on this the 6th day of March, 2017:

Paul A. Miller  
Patrick W. Franklin  
MILLER, CHRISTIE & KINNEY, P.C.  
2090 Columbiana Road, Suite 3400  
Birmingham, Alabama 35216  
*Attorneys for Defendants*

/s/ Jeffrey P. Leonard



## AlaFile E-Notice

01-CV-2017-900207.00

To: JEFFREY PHILLIPS LEONARD  
jleonard@hgdllawfirm.com

---

## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

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205-325-5355  
anne-marie.adams@alacourt.gov



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ANGELA PAGE ET AL V. SAHDEV DHALIWAL TRANSPORT, INC ET AL  
01-CV-2017-900207.00

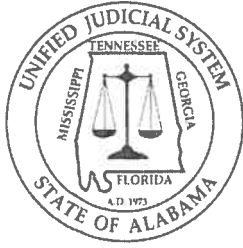
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